

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Fox Shiver, LLC, a New York Limited
Liability Company;

Plaintiff

Case No: 1:23-cv-1898-JPO

v.

Individuals, Corporations, Limited
Liability Companies, Partnerships,
and Unincorporated Associations Identified
on Schedule A to the Complaint,

Defendants.

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**NOTICE OF MOTION FOR RECONSIDERATION OR IN THE ALTERNATIVE, FOR
A CONTINUANCE AND EXTENSION OF THE PRELIMINARY INJUNCTION
HEARING AND TEMPORARY RESTRAINING ORDER**

PLEASE TAKE NOTICE THAT, in accordance with the Court's Local Rule 6.3 and Federal Rule of Civil Procedure 60, or alternatively, Federal Rule of Civil Procedure 65, Plaintiff, by and through their undersigned counsel, move for reconsideration of the Court's order concerning service of the Temporary Restraining Order through the Hague Convention, or in the alternative, for a continuance and extension of the preliminary injunction hearing and temporary restraining order.

Respectfully submitted,

Date: May 12, 2023

By: /s/ Dmitry Lapin
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